



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 27 2015

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL #7009 1680 0000 7679 5692**  
**RETURN RECEIPT REQUESTED**

Mr. Neil Shoemaker  
Health, Safety & Environmental Manager  
Honeywell Aerospace  
3520 Westmoor Street  
South Bend, Indiana 46628

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA ID No.: IND 088 736 103

Dear Mr. Shoemaker:

On April 14-16, 2015 representatives of the U.S. Environmental Protection Agency conducted a multimedia inspection of the Honeywell Aerospace (Honeywell) facility located in South Bend, Indiana. The purpose of the inspection was to evaluate Honeywell's compliance with certain environmental regulations. As a large quantity generator of hazardous waste, Honeywell is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). This letter relates to Honeywell's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Honeywell, EPA's review of records pertaining to Honeywell and the inspector's observations, EPA has determined that Honeywell has unlawfully stored hazardous waste without a permit or interim status as a result of Honeywell's failure to comply with certain conditions for a permit exemption under Indiana regulations at 329 IAC § 3.1-7-1 [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Honeywell was out of compliance at the time of the inspection in paragraphs 1-5, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated by reference into the Indiana regulations at 39 IAC § 3.1-7-1, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding



TSD requirement. The exemption condition identified in paragraph 1 is also an independent TSD requirement incorporated from 329 IAC § 3.1-7-1. Accordingly, each failure of Honeywell to comply with these conditions is also a violation of the corresponding requirement in 329 IAC § 3.1-10-1 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or 329 IAC § 3.1-9-1 [40 C.F.R. Part 264] (if the facility should have been permitted).

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS**

At the time of the inspection, Honeywell was out of compliance with the following large quantity generator permit exemption conditions:

The permit exemption conditions identified below in paragraphs 1, 4 and 5 are also independent TSD requirements violated by Honeywell:

1. Contingency Plan

In order to avoid the need for a hazardous waste storage permit, a large quantity generator must submit a copy of its contingency plan and revisions to the plan to the local police department, fire department, hospital and state and local emergency response teams that may be called upon to provide emergency services. See, 329 IAC §§ 3.1-7-1 and 329 IAC 3.1-10-1 [40 CFR §§ 262.34(a) (4) and 265.53(b)].

At the time of the inspection, Honeywell had not submitted a copy of the facility contingency plan and revisions to the plan to the local police department and hospital that may be called upon to provide emergency services.

2. Date When Each Period of Accumulation Begins

Under 329 IAC § 3.1-7-1 [40 CFR § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, Honeywell maintained one 55-gallon container of naphthalene and oil flare waste that was not marked with the date upon which the period of accumulation of hazardous waste began in Plant 35.

3. Hazardous Waste Container labeling

Under 329 IAC § 3.1-7-1 [40 CFR § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, the following containers used to hold hazardous waste in the satellite accumulation area were not labeled with the words "hazardous waste" or other content identifying words:

- one 30-gallon container of IPA waste located at the alcohol test stand;
- one 5.3-gallon of pain thinner waste and one 9-gallon container of waste rags, resin, used paint, etc. located at spray booth 1; and
- one 30-gallon container of hazardous waste rags located in the print room (Plant 35).

#### 4. Use and Management of Containers

Under 329 IAC §§ 3.1-7-1 and 329 IAC 3.1-10-1 [40 CFR §§ 262.34(a)(1)(i) and 265.173(a)], a large quantity generator must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, Honeywell did not keep one 55-gallon container holding hazardous waste solids closed during storage, and waste was not being added or removed while it was open in the maintenance painter crib area.

#### 5. Preparedness and Prevention

Under 329 IAC §§ 3.1-7-1 and 329 IAC 3.1-10-1 [40 CFR §§ 265.35], an owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.

At the time of the inspection, Honeywell was not maintaining adequate aisle space in Plant 35.

During the inspection, as observed by EPA, you took certain actions to establish compliance with violation numbers 2, 3 and 4.

Summary: By failing to comply with the conditions for a permit exemption, above, Honeywell became an operator of a hazardous waste storage facility, and was required to obtain an Indiana hazardous waste storage permit. Honeywell's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Indiana Administrative Code 3.1-13-1 [40 CFR §§ 270.1(c) and 270.10(a) and (d)].

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to violations 1 and 5. You should submit your response to Sheila Burrus, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sheila Burrus, of my staff, at 312-886-3587 or at [burrus.sheila@epa.gov](mailto:burrus.sheila@epa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary J. Victorine".

Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Nancy Johnston, Indiana Department of Environmental Management  
([njohnston@idem.in.gov](mailto:njohnston@idem.in.gov))



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSTALLATION NAME:** Honeywell Aerospace

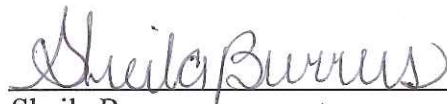
**U.S. EPA ID. No.:** IND 088 736 103

**LOCATION ADDRESS:** 3520 Westmoor Street  
South Bend, Indiana 46628

**DATE OF INSPECTION:** April 14-16, 2015

**U.S. EPA INSPECTORS:** Sheila Burrus, RCRA Hazardous Waste  
Virginia Galinsky, Clean Air Act  
Paul Novak, OECA-Multimedia Team Leader


**PREPARED BY:**



Sheila Burrus  
Environmental Protection Specialist

6/1/15  
Date:

**APPROVED BY:**



Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch  
Land and Chemicals Division

6/1/15  
Date:





### **Purpose of Inspection**

The purpose of the RCRA portion of the multimedia inspection was to conduct an un-announced compliance evaluation inspection (CEI) at Honeywell Aerospace (Honeywell), located at 3520 Westmoor Street, South Bend, Indiana, to evaluate Honeywell's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically those regulations related to the management of hazardous waste and used oil.

**Participants:** Neil Shoemaker, Erin Brown, Dean Palmer, Rebecca Beaver, Ann-Marie Pendl, Stephen Kushner, Charles Garvin, Michael Lambert, Chris Desborough, Gale Maupin, Ted Bobak, James Roe, Tony Martin, Justin Finger, Harry Chisholm and Greg Bopp represented Honeywell. Rick Reynolds and Eddie Depositari represented the Indiana Department of Environmental Management. Sheila Burrus, Virginia Galinsky and Paul Novak represented EPA Region 5.

### **Installation Description/Background**

The Honeywell facility is a manufacturer of wheel and brake systems, landing gears and other systems for the commercial and military aircraft industry. The manufacturing process for brakes and metal wheels involves cutting, milling, grinding, pressing, etching, drilling, deburring, anodizing, washing, painting, coating, testing and assembly. The manufacturing process for carbon brakes involves pressure molding, carbon segment needling, densification, machining, testing and assembly.

Honeywell also conducts research and development activities on aircraft fueling and hydraulics systems for airbrakes.

Honeywell has five less than 90-day hazardous waste storage areas located in the following locations: (1) Plant 35 for the storage of corrosives, waste aromatic and chlorinated organics, chromium or lead bearing wastes, and lab packs containing various quantities of discarded laboratory chemicals; (2) roll-off container located outside of building 35 for paint-related and other solid waste containing benzene and/or chromium; (3) roll-off container outside Plant 19 for chromium-bearing wastewater treatment sludge; (4) storage area south of the anodize line for chromium-bearing wastewater and rinse tank water from the anodizing process; and (5) the antioxidant room for the collection of phosphoric based wastewater.

Honeywell hazardous waste satellite accumulation areas are located throughout its facility.

Honeywell was last inspected by the Indiana Department of Environmental Management on May 15, 2012.

A review of hazardous waste manifests and waste volume on-site indicates that Honeywell has been operating as a large quantity generator.

Hazardous waste is shipped off-site every 1-2 weeks, wastewater treatment sludge every 90 days and lab packs 4-6 times per week. Lab packs consist of outdated waste, acids, bases and nonhazardous flammables.

### **Waste Generation**

Among the waste streams generated at this installation are acid rinse/caustic solution from its densification process; waste acid liquid chrome from anodizing, wheel and brake manufacturing process; resin, solids, rags, filters, and paint/paint thinner from its spray-painting application process; wastewater treatment sludge from wastewater treatment; naphthalene and oil flare waste from carbon vapor deposition/high temperature treatment (CVD/HTT) furnaces; isopropanol waste from testing hydraulic lines; char liquid residue from cleanout of process equipment; waste aerosol cans; lab packs; small chemical containers from consolidation and cleanup and nitric acid.

Used oil is generated from maintenance operations.

### **Opening Conference**

I arrived at Honeywell at 8:50 a.m. on March 14, 2015. I introduced myself to personnel at the security station and presented my enforcement credentials. Neil Shoemaker came to the security station to assist me. I presented my enforcement credential to Mr. Shoemaker. We then proceeded into a conference room where Paul Novak and Virginia Galinsky were being provided with an overview of the facility's process operations. Once the overview of the facility's process operations ended, Erin Brown provided a brief RCRA overview of the facility's process operations.

Members from the multimedia team explained to Honeywell staff what specific records were needed for each specific program, as well as, asked specific questions related to each program.

I asked Ms. Brown for a brief description of the type of work done at the facility and the types of wastes generated. Ms. Brown began to provide background and waste stream information about Honeywell which is included above in the installation description/background and waste generation sections of this report.

The U.S. EPA OECA Small Business Resource Information Sheet, the U.S. EPA – Region 5 Pollution Prevention State Contact list, Illinois Waste Management Research Sustainable Solutions Brochure and the U.S. EPA Managing Used Oil Advice for Small Business brochure were given to Erin Brown, HSE Generalist of Honeywell by the inspector, at the time of the inspection.

I continued the opening conference by asking who picks up Honeywell's hazardous waste, used oil and universal waste lamps and batteries. Ms. Brown indicated that Clean Harbors located in Dolton, Illinois is responsible for picking up its hazardous waste, universal waste lamps and batteries and transporting it back to Clean Harbors for recycling and disposal.

Safety Kleen located in Richardson, Texas, picks up its used oil.

### **Visual Site Inspection (VSI) - April 14, 2015**

The multimedia team was taken on a tour of the facility before each program separated to conduct program specific VSI.

I was accompanied by Ms. Brown during the RCRA portion of the VSI which began in the material technology center lab. I observed a closed/labeled 3-gallon container of corrosive waste generated from ICP and tank analysis. There was also a closed/labeled 5-gallon container of alodine generated from expired product (Photograph 1).

Next, we proceeded to an open (clasp on floor next to drum) 55-gallon container with a labeled that read "universal waste glass" located next to shipping/receiving (Photographs 2-6). Ms. Brown stated that the container should have been labeled as RCRA emptied. I asked her to remove the lid. The container was filled with glass jars and some of the jars had residual in them. I asked Ms. Brown where the waste in the container was being generated, she did not know. Ms. Brown went into the lab and came back with Mike Spross. I asked Mr. Spross if the 55-gallon satellite accumulation container of waste was being generated in the lab. Mr. Spross stated that some of the glass jars in the container came from his lab but he could not confirm which ones since the container was not under his control. I asked Mr. Spross under who's control was the container, but he did not know. I then asked how long the container had been in the corner. He said approximately one month. Ms. Brown stated during the briefing that a waste determination would be performed on the containers containing residual. I received an email from Erin Brown on May 8, 2015, indicating the material (residual) in the bottles was nonhazardous.

We then proceeded to inspect: nose wheel, final assembly line, alcohol test stand, paint area, mixing room, spray booths 1 and 2, anodize line, maintenance painter crib and engineering testing area, as well as other areas of the facility.

The following is a summary of information obtained while touring the above areas.

- There was one closed/labeled 55-gallon container of aerosol cans located in the nose wheel area (Photograph 7).
- There was one closed/labeled 55-gallon container of resin rags located at the final assembly line (Photograph 8).

- There was one closed unlabeled 30-gallon container of IPA waste located at the alcohol test stand. The container was labeled at the time of the inspection (Photographs 9-10).
- There was one closed/labeled 55-gallon container of PPE located in the paint area (Photograph 11).
- There was one closed/labeled 55-gallon container of lacquer thinner, one closed/labeled 55-gallon container of PPE and one closed/labeled 55-gallon container of paint thinner located in the mixing room. Photos were prohibited in this area.
- There was one unlabeled 5.3 gallon container of paint thinner waste and one unlabeled 9-gallon container of waste rags, resin, used paint, etc. located at spray booth 1. The containers were labeled at the time of the inspection. Photos were prohibited in this area.
- There was one closed/labeled 2-gallon container of paint thinner and one labeled 3.5 gallon container of waste rags, resin, used paint, etc. located at spray booth 2. Photos were prohibited in this area.
- There was one closed/labeled 30-gallon container of nitric acid located at the west end of the non-destructive testing area (Photograph 12).
- There was one closed/labeled 55-gallon container of solids generated from the anodize line (Photograph 13).
- There was one open 55-gallon container of solids and one closed/labeled 55-gallon container of paint thinner located in the maintenance painter crib area. The open container of solids was immediately closed (Photographs 14-16).
- There was one closed/labeled 55-gallon container of spent aerosol cans located in the engineering testing building (Photograph 17).

The VSI and a briefing of findings ended at 4:45 p.m.

#### **VSI and Records Review Continued on April 15, 2015**

I was accompanied by Ms. Brown during the continuation of the VSI inspection and records review. The areas of the Honeywell facility inspected included carbon finishing, char furnace areas, auto perform press, CVD areas, antioxidant room, facility shop, fuel control operation, outdoor retention pond, plant 35 (90-day storage area), test fuel controls, plant 19, plant 26, anodize line, waste end of zyglon and plant 3.

The following is a summary of information obtained while touring Plant 4A and the antioxidant room.

- There was one closed/labeled 55-gallon container of solid waste (rags, resin, toxic, etc.) located in carbon finishing (Photograph 18).
- There was one closed/labeled 55-gallon container of char liquid residue located at char furnace 1 (Photograph 19).
- There was one closed/labeled 55-gallon container of solids (resin, rags, etc.) located at char furnace 4 (Photograph 20).
- There was one closed/labeled 55-gallon container of aerosol cans located at auto perform press 2 and one closed/labeled 55-gallon container located at the north wall of the maintenance area (Photographs 21-22).
- There were closed/labeled 55-gallon containers of hazardous waste solids (rags, resin, etc.) located at char furnace 6, southwest corner of machine shop, CVDs 4/5, 10, 18, 19, 23, 27 and at railing before hill (Photographs 23-31).
- There was one closed/labeled 275-gallon tote of hazardous waste corrosive liquid located in antioxidant room awaiting neutralization. There was also one 55-gallon drum of waste awaiting a waste determination by the facility (Photographs 32-33).

The following is a summary of information obtained while touring the facility shop.

- There was one closed/labeled 55-gallon container of solids located in the wastewater treatment area and fuel control operation area (Photograph 34).
- There was one closed/labeled container of sludge located underneath the filter press (Photograph 35).
- There was one closed/labeled 275-gallon container of antioxidant (Photograph 36).

Next, we proceeded to Plant 19 – Fuel Control Operation Area where I observed one 55-gallon drum of hazardous waste solids (Photograph 37).

We then proceed to the exterior room pump house where I observed one closed/labeled 55-gallon container of isopropyl alcohol test waste generated in the flow lab. The waste is transferred via piping into the 55-gallon drum (Photograph 38).

After leaving the pump house we proceeded to the retention pond where I observed a closed/labeled 90-day roll-off of hazardous waste sludge (Photograph 39).

The following is a summary of information obtained while touring Plant 35.

- There was a closed/labeled hazardous waste roll-box filled with solids (resin, rags, etc.) located outside of Plant 35 (Photograph 40).
- There were four 55-gallon containers of naphthalene and oil flare waste. One of the 55-gallon containers of the naphthalene and oil flare waste did not have a date on the drum (Photograph 41). The facility's logbook showed that the drum was transported to the 90-day hazardous waste storage area on March 6, 2015. The March 6, 2015 date was placed on the container. A work order was generated so that I could take a picture of the undated drum (Photograph 41). There were numerous drums stored in this area which made it very difficult to visually inspect the labels on the containers due to inadequate aisle space.
- There were two closed/labeled red stericycle containers of medical waste in the Medical Waste area (needles, sharps, response material from blood clean-up) (Photograph 42).
- There was one pallet of miscellaneous waste waiting to have a waste determination performed (Photograph 43). Some of the containers were labeled as atomized iron powder, silicon metal powder, silicon carbide, graphite and aluminum oxide. The containers of waste were transferred to Plant 35 on the day of the inspection, according to Ms. Brown.

The following is a summary of information obtained while touring Plant 14, Test Fuel Control.

- There was one closed/labeled 5-gallon container of ferric chloride (Photograph 44).
- There was one unlabeled 30-gallon container of hazardous waste rags located in the print room. The container was labeled at the time of the inspection (Photographs 45-46).
- There was one closed/labeled 5-gallon container of MEK isopropyl acetone generated from dipping operations and one closed/labeled 5-gallon container of flammable liquid (acetone) generated from cleaning operation (circuit boards) (Photograph 47).

The following is a summary of information obtained while touring Plant 26.

- There was one closed/labeled 5-gallon container of used batteries and one closed/labeled 55-gallon container of aerosol cans (Photographs 48-49).

Next, we proceeded to the anodize line where there were five partially-filled 275-gallon containers of chromium sludge generated from tank clean-out (Photograph 50).

After leaving Plant 14, we proceeded to Plant 3 where there was a closed/labeled container of universal waste lamps (Photograph 51).

I observed labeled 55-gallon containers of used oil throughout the facility (Photographs 52-57).

The VSI and briefing ended at approximately 5:00 p.m.

#### Records Review

For the records review, I requested the most current contingency plan, hazardous waste manifests, land disposal restriction forms, waste analysis data, hazardous waste training records, annual reports and weekly inspection logs for the 90-day hazardous waste storage areas.

My observations are categorized below:

#### Contingency plan

I reviewed Honeywell contingency plan dated April 2015 and found it to contain the information required under 329 Indiana Administrative Code 3.1-10-2 and 40 Code of Federal Regulations Section § 265.52.

Honeywell was unable to provide documentation showing that a copy of the contingency plan had been sent to the local emergency authorities.

I reviewed hazardous waste manifests for the years 2012-2014, land disposal restriction forms, waste analysis data for 22 waste streams, hazardous waste training records/job descriptions for employees that handle and manage hazardous waste, annual reports for the years 2012-2014, and weekly inspection logs for the 90-day hazardous waste storage areas for the years 2013-2015. Honeywell is properly maintaining these records on site as required for a large quantity generator.

#### Closing Conference

In closing, a conference was held. I summarized where I had been taken during the RCRA portion of the VSI and what information Ms. Brown had presented to me. Ms. Galinsky summarized where she had been taken during the Air portion of the VSI and what information had been given to her. We thanked everyone for their cooperation and concluded the CEI at approximately 5:00 p.m.

#### **The VSI continued on April 16, 2015.**

I returned to Honeywell to inspect Plant 11, chemical storage area after being informed by Paul Novak after the closing conference on April 15, 2015, about storage tanks in the chemical storage area. The chemical storage area used to be the wastewater treatment

plant before it was relocated to another area within the facility in May of 2012. There were three cleaned/emptied 1,000 gallon hazardous waste storage tanks in the area. Paul Novak looked inside the tanks to verify that they were indeed emptied. The tanks will remain on-site for possible reuse in the future (Photograph 58-60).

The VSI of the chemical storage area ended at approximately 8:20 a.m. I thanked everyone for their time and exited the facility.

Attachments

Inspection Checklist

Photographs 1 through 60



**U.S. EPA Generator Checklist for Indiana**

5/18/2015

*Honeywell Aerospace*  
INB 088 736 103

**PART 262: Standards Applicable to Generators of Hazardous Waste**

#	40 CFR	NA = Not Applicable, NI = Not Inspected, OK = In Compliance, DF = Deficiency	NA	NI	OK	DF
		<b>GENERAL</b>	NA	NI	OK	DF
1	262.11	Hazardous Waste Determination (characteristic, listed, TCLP, knowledge, exclusions)			✓	
2	262.12(a)	EPA Identification Number (Generator must have ID number)			✓	
3	262.12(c)	Generator must not offer waste to transporters or facilities that have not received ID number.			✓	
329 IAC 3.1-7/4-6 & 8 & 11		<b>THE MANIFEST</b>	NA	NI	OK	DF
4	262.20	General Requirements (manifest to approved TSD/alt. TSD, SQG reclaim exemption on file)(all required info)			✓	
5	262.21	Manifest Acquisition (generator state 1st, consignment state 2nd)			✓	
6	262.22	Number of Copies (generator, transporters, TSD, & 1 copy returned to generator)			✓	
7	262.23	Manifest Use (signature & date: generator, transporter, TSD, keep copy)			✓	
8	329 IAC 3.1-7-4	Indiana Manifest required for hazardous waste shipped to Indiana TSD Facilities			✓	
9	329 IAC 3.1-7-6	Manifest copies available for review, submitted copies within 5 days after shipping			✓	
		<b>PRE-TRANSPORT REQUIREMENTS</b> <b>NOTE: If facility treats in &lt; 90 day tanks or containers, see 268.7</b>				
10	262.30, 31, 32, 33	Packaging, Labeling, Marking, Placarding (DOT regulations) (Only apply if waste is in the process of being transported)				
		<b>LARGE QUANTITY GENERATORS</b>	NA	NI	OK	DF
11	262.34(a)	90 Day accumulation limit: Generator may accumulate on-site for 90 days or less provided that:			✓	
12	262.34(a)(1)	Waste is placed in tanks, containers, containment building, or drip pad			✓	
13	262.34(a)(2)	Container marked with start of accumulation date				✓
14	262.34(a)(3)	Container/tank marked "Hazardous Waste"			✓	
15	262.34(b)	30 Day extension	✓			
		<b>SATELLITE CONTAINERS</b>	NA	NI	OK	DF
16	262.34(c)(1)	Satellite accumulation (55 gal. maximum or one (1) quart acutely hazardous)				
17	262.34(c)(i)	i) Container must be closed when not in use, in good condition, and compatible with waste				✓
18	262.34(c)(ii)	ii) marked "Hazardous waste" or other words, at or near process and under control of operator			✓	

# U.S. EPA Generator Checklist for Indiana

5/18/2015

19	262.34(c)(2)	If exceed 55 gal., container must be marked with accumulation date and must be removed within 3 days			✓	
<b>SMALL QUANTITY GENERATOR</b>			NA	NI	OK	DF
20	262.34(d)(e)(f)	SQG Requirements - 180 days or less (unless transported over 200 miles), quantity of hazardous waste on-site 6000 kg. or less, must follow:				
21	262.34(d)(4)	Containers marked with start of accumulation date and words "Hazardous Waste"				
22	262.34(d)(4)	Must also comply with 265 Subpart C and I. See pages 4 and 5.				
23	262.34(d)(5)	i) Emergency coordinator identified				
24	262.34(d)(5)	ii) Following info posted: emergency coordinator, emergency equipment location, phone numbers				
25	262.34(d)(5)	iii) Employees must be familiar with handling and emergency procedures				
26	262.34(d)(5)	iv) Respond to emergencies				
<b>RECORD KEEPING</b>			NA	NI	OK	DF
27	262.40	RECORD KEEPING (3 yrs. for copy from manifests, TSD, biennial report, exception report, test results, waste analysis/determination, extension time for unresolved enforcement.)			✓	
28	262.41	Biennial Report (due March 1 even numbered years) ( <b>LQG ONLY</b> )			✓	
29	262.42	Exception Reporting (LQG: >35 days, if no return copy of manifest, contact TSD: >45 days report to IDEM, (SQG: >60 days) transportation report to IDEM)			✓	
30	262.43	Additional Reporting, if required by Commissioner (concerning quantities and disposition of wastes in 40 CFR 261)	✓			
31	262.44	SQG Recordkeeping Requirements (keep records for 3 years: manifests, exceptions, waste determination/analysis)	✓			
<b>EXPORTS</b>			NA	NI	OK	DF
32	262.52	General Requirements (notify EPA, accepted by receiving country, EPA consent)				
33	262.53	Notification of Intent to Export				
34	262.54	Special Manifest Requirements for Primary Exporters				
35	262.55	Exception Reports (>45 days from US departure, >90 days from receipt by foreign source/waste returned to US)				
36	262.56	Annual Reports (March 1 annually for waste: types, quantity, frequency, destination, waste reduction send to EPA)				
37	262.57	RECORD KEEPING (3 years for intent to export, EPA acknowledgments, confirmation of delivery, and annual reports)				
<b>IMPORTS OF HAZARDOUS WASTE</b>			NA	NI	OK	DF
38	262.60	Hazardous Waste Imports (use consignment state's manifest)				

# U.S. EPA Generator Checklist for Indiana

5/18/2015

		<b>TSD STANDARDS APPLIABLE TO GENERATORS</b>	NA	NI	OK	DF
		<b>GENERAL FACILITY STANDARDS (NA for SQG)</b>				
39	262.34 / 265.16(a)	Personnel Training (Program Adequacy)			✓	
40	262.34 / 265.16(b)	Personnel received training within six (6) months			✓	
41	262.34 / 265.16(c)	Personnel received annual review			✓	
42	262.34 / 265.16(d)	Training Documents: job titles, job description, type of training, training records			✓	
		<b>PREPAREDNESS AND PREVENTION</b>	NA	NI	OK	DF
43	262.34 / 265.31	Maintenance & Facility Operation(must be maintained & operated to minimize possibility of release)			✓	
44	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extinguishers and spill control equipment d. water/foam)			✓	
45	262.34 / 265.33	Testing & Maintenance of Equipment			✓	
46	262.34 / 265.34	Communication & Alarm Access			✓	
47	262.34 / 265.35	Required Aisle Space (to allow movement of spill control and emergency equipment and inspections)				✓
48	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital)			✓	
		<b>CONTINGENCY PLAN &amp; EMERGENCY PROCEDURES (NA for SQG)</b>	NA	NI	OK	DF
49	262.34 / 265.51	Contingency Plan for Facility			✓	
50	262.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.)			✓	
51	262.34 / 265.53	Contingency Plan Available (on-site, local distribution)			✓	
52	262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes)			✓	
53	262.34 / 265.55	Emergency Coordinator available			✓	
54	262.34 / 265.56	Emergency Procedures followed			✓	
		<b>USE &amp; MANAGEMENT OF CONTAINERS</b>	NA	NI	OK	DF
55	262.34 / 265.171	Container Condition (If not in good condition or leaking, must transfer waste or manage in some other way)			✓	

# U.S. EPA Generator Checklist for Indiana

5/18/2015

56	262.34 / 265.172	Waste Compatibility with Container			✓	
57	262.34 / 265.173	Container Management (closed/manged to prevent leaks)			✓	
58	262.34 / 265.174	Inspections (weekly)			✓	
59	262.34 / 265.176	Ignitable/Reactive Waste (50 ft. set back)			✓	
60	262.34 / 265.177	Special Requirements for Incompatible Waste (physical separation/container compatibility)			✓	
<b>LAND DISPOSAL RESTRICTIONS</b>			<b>NA</b>	<b>NI</b>	<b>OK</b>	<b>DF</b>
61	268.3	Dilution prohibited as substitute for adequate treatment			✓	
62	268.7	Waste Analysis, Recordkeeping (LDR Notifications: waste code, whether it is a wastewater or non-wastewater, waste constituents to be monitored if monitoring will not include all regulated constituents, subcategory if applicable, and manifest number.)			✓	
63	268.7 (a)(4)	Treatment in 90-day tanks/containers requires waste analysis plan and testing frequency, filed with Regional Administrator (IDEM), certification of shipment, retained copies on-site (5 yrs.), notifications include: EPA ID #, treatment standards with 5 letter code, and manifest number			✓	
64	268.7(a)(7)	Notifications must be kept on-site for five (5) years			✓	
65	268.9	Listed and characteristic waste codes assigned for listed waste exhibiting characteristic			✓	
66	268.42	Alternative treatment specified for lab packs, mixed waste: most stringent standards			✓	
67	268.45	Treatment standards for hazardous debris				
<b>OTHER</b>			<b>NA</b>	<b>NI</b>	<b>OK</b>	<b>DF</b>
68	IC 13-30	Release of contaminants to environment	✓			
69	IAC 3.1-7-8	Facility has waste minimization program as certified on manifest	✓			
70	IC 13-30-2-1 (9)	Does facility have any processes or activities (e.g. waste piles, incinerators, land disposal) which require a permit or interim status? If so, please identify below:	✓			



PHOTOGRAPH: 60

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 16, 2015

LOCATION OF PHOTOGRAPH:

Plant 11, Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

Emptied 1,000 gallon hazardous waste storage tanks

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103





PHOTOGRAPH: 59

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 16, 2015

LOCATION OF PHOTOGRAPH:

Plant 11, Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

Emptied 1,000 gallon hazardous waste storage tanks

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103



PHOTOGRAPH: 58

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 16, 2015

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103





PHOTOGRAPH: 57

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 14, 2015

LOCATION OF PHOTOGRAPH:

Robot Cell

SCENE BEING PHOTOGRAPHED:

labeled 55-gallon container of used oil

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103





PHOTOGRAPH: 56

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

West End of Ziplo

SCENE BEING PHOTOGRAPHED:

55-gallon drum of used oil

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103



PHOTOGRAPH: 55

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

southwest corner of machine shop

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon container of used oil

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103





PHOTOGRAPH: 54

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

Facility Shop

SCENE BEING PHOTOGRAPHED:

labeled 55-gallon container of used oil

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103



PHOTOGRAPH: 53

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

Facility Shop

SCENE BEING PHOTOGRAPHED:

labeled 55-gallon container of used oil

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

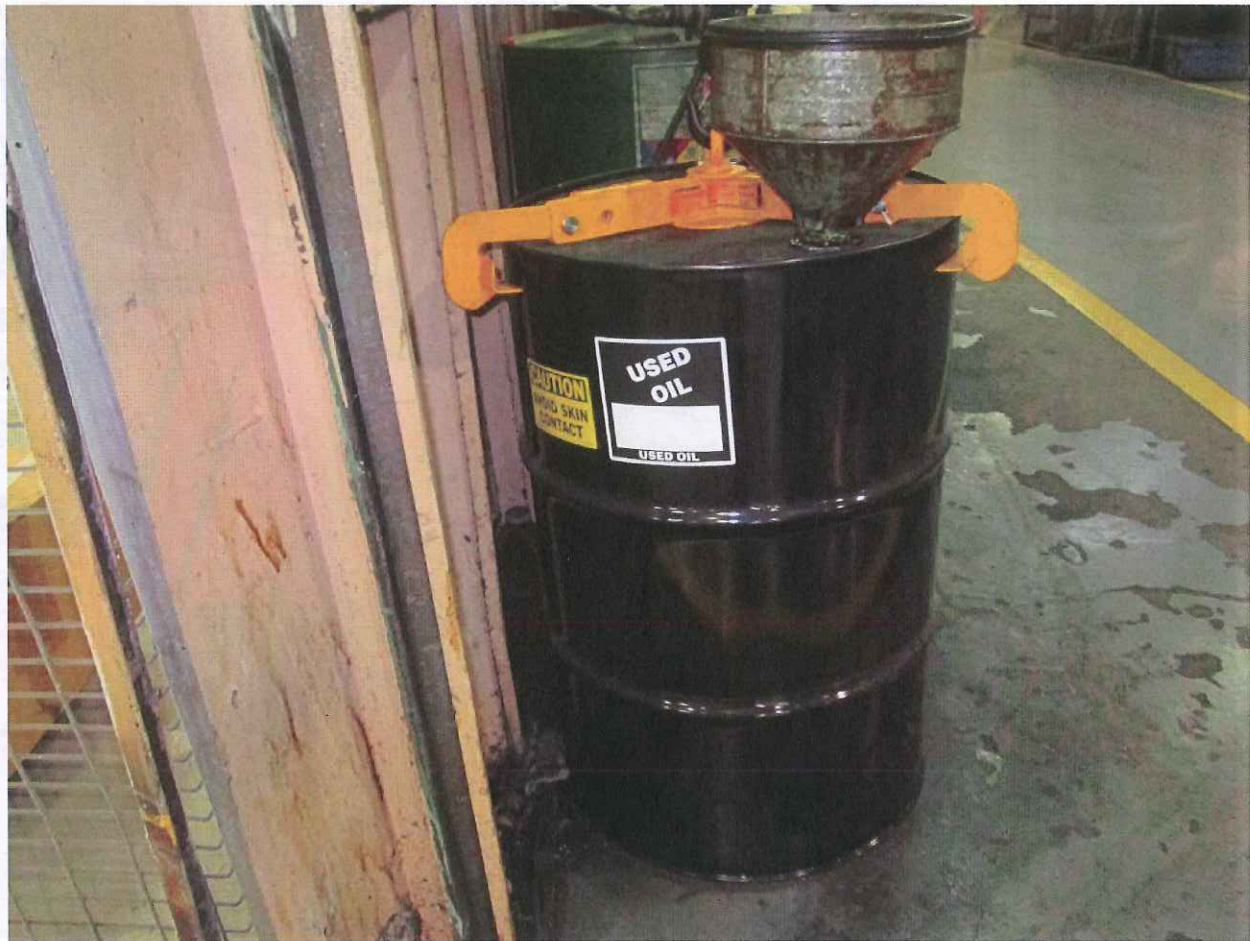
INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103





PHOTOGRAPH: 52

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

Facility Shop - disposition crib

SCENE BEING PHOTOGRAPHED:

labeled 55-gallon container of used oil

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103



PHOTOGRAPH: 51

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

Plant 3

SCENE BEING PHOTOGRAPHED:

closed/labeled container of universal waste lamps

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103





PHOTOGRAPH: 50

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

90-day Hazardous Waste...Anodize Line

SCENE BEING PHOTOGRAPHED:

five 275-gallon partially filled containers of chromium sludge

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103



PHOTOGRAPH: 49

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

Plant 26

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon container of aerosol cans

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103





PHOTOGRAPH: 48

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

Plant 26

SCENE BEING PHOTOGRAPHED:

5-gallon container of used batteries

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103



PHOTOGRAPH: 47

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

Plant 14

SCENE BEING PHOTOGRAPHED:

closed/labeled 5-gallon white container of MEK

Isopropyl and 5-gallon red container of (flammable liquid) acetone

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103





PHOTOGRAPH: 46

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

April 15, 2015

LOCATION OF PHOTOGRAPH:

Plant 14, Print Room

SCENE BEING PHOTOGRAPHED:

closed/labeled 30-gallon container of hazardous waste rags

SITE LOCATION:

3520 Westmoor Street

South Bend, Indiana

INSTALLATION NAME:

Honeywell Aerospace

INSTALLATION I.D. #

IND 088 736 103



PHOTOGRAPH: 45  
NAME OF PHOTOGRAPHER: Sheila Burrus  
DATE OF PHOTOGRAPH: April 15, 2015  
LOCATION OF PHOTOGRAPH: Plant 14  
SCENE BEING PHOTOGRAPHED: unlabeled 30-gallon container of hazardous waste rags  
SITE LOCATION: 3520 Westmoor Street  
South Bend, Indiana  
INSTALLATION NAME: Honeywell Aerospace  
INSTALLATION I.D. #: IND 088 736 103